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TO RUEHC/SECSTATE WASHDC PRIORITY 7213
INFO RUEHZL/EUROPEAN POLITICAL COLLECTIVE PRIORITY
RHEHNSC/NSC WASHDC PRIORITY
RUEATRS/DEPT OF TREASURY WASHDC PRIORITY
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SENSITIVE
SIPDIS

NEA/IR, EUR/CE, TREASURY FOR OFAC

E.O. 12958: N/A

TAGS: [ETRD](#) [ETTC](#) [SI](#) [IR](#)

SUBJECT: SLOVENIAN COMPANY AKS IF SHIP TRACKING DEVICES
FALL UNDER IRAN SANCTIONS REGIME

[1](#)1. (U) This is an action request; see paragraph 4.

[1](#)2. (SBU) The Business development manager of the Slovenian company EMA, a manufacturer of coding and tracking solutions (satellite tracking devices for use on ships), contacted Post on 13 March about selling maritime trackers with American-made Iridium satellite modems to Iran. The customer, Persian Marine Industries Co., has made payment, however EMA has not yet received the money. EMA requested guidance before it ships the product which it plans to do on or about 17 March. The business development manager stressed that EMA wanted to be cautious, although EMA was hoping that its tracking device did not come under sanctions. He explained that its maritime tracker uses a modem that is made by an American company Iridium.

[1](#)3. (SBU) EMA suggested to Post that the equipment should be exempt from sanctions because it is compulsory equipment for ships registered with the International Maritime Organization, and because their competition, Inmarsat, is already supplying a different type of maritime tracking system to Iran that the equipment would be exempt from sanctions. According to Post research, based on Iranian Transaction Regulations (ITR) section 560.511, any exception to the prohibition on the sale of U.S. goods and services would require that U.S. content be de minimis. EMA has provided no information addressing this restriction.

[1](#)4. (SBU) Post requests guidance for response to EMA.
FREDEN